

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA	§	
	§	No. 4:18CR109
v.	§	Judge Mazzant
	§	
PEDRAM REZAEI HAGHIGHI (2)	§	

ELEMENTS OF THE OFFENSE

You are charged in Count One of the Indictment with a violation of 21 U.S.C. § 846, Conspiracy to Distribute and Possess with the Intent to Distribute Morphine and MDMA. The essential elements which must be proven to establish the offense are as follows:

- First: That the defendant and one or more persons, directly or indirectly, reached an agreement to commit the crime charged in the Indictment, that is, to distribute or possess with intent to distribute Morphine, a Schedule II controlled substance, or 3,4-Methylenedioxy-methamphetamine (“MDMA” or “Ecstasy”), a Schedule I controlled substance;
- Second: That the defendant knew of the unlawful purpose of the agreement;
- Third: That the defendant joined in the agreement willfully, that is, with the intent to further its unlawful purpose;

Respectfully submitted,

JOSEPH D. BROWN
UNITED STATES ATTORNEY

/s/ _____
JAY R. COMBS
Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was filed and served via CM/ECF to defense counsel on this the 19th day of October, 2018.

/s/ _____
JAY R. COMBS